

**EXHIBIT C**

**Deposition Transcript of Eugene Chrinian**

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UNITES STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CASE NO. 13-CV-2443 (DMC) (MF)  
CIVIL ACTION

MOHAMMAD MANSOUR and :  
MARK MOSES, :  
 :  
Plaintiffs, :  
vs. :  
FACTORY DIRECT OF SECAUCUS, :  
LLC d/b/a ASHLEY FURNITURE :  
HOMESTORE, :  
Defendant. :

Deposition of EUGENE CHRINIAN  
taken in the above-entitled matter before  
Suzanne J. Stotz, a Certified Court Reporter  
(License No. 30XI00184500) and Notary Public of  
the State of New Jersey, taken at the offices  
of ARCHER & GREINER, P.C., Court Plaza South,  
West Wing, 21 Main Street, Suite 353,  
Hackensack, New Jersey 07601, on Friday,  
August 1, 2014, commencing at 9:14 a.m.

<p>1 A. It was just her professional 2 opinion that I should be aware, and I would 3 expect that she would take the necessary steps. 4 Q. At that time did the HR employee 5 inform you to whom Ms. Hoang initially made her 6 complaint? 7 A. I don't recall. 8 Q. Are you aware that the complaint 9 was initially made to Mr. Mansour? 10 A. No. 11 Q. Are you aware of an investigation 12 that took place into Ms. Hoang's complaint? 13 A. Subsequent, as I said, I 14 directed -- I didn't direct. The HR -- I had 15 Ms. Hoang -- she raised her concern. I 16 directed her to the HR manager so the HR 17 manager could take the appropriate steps, 18 whatever those steps would be. 19 Q. Did you at any time direct the HR 20 manager to keep the accusation quiet? 21 A. No. 22 Q. Are you aware of anyone contacting 23 Mr. Mansour with respect to Ms. Hoang's 24 allegation? 25 A. No.</p> <p style="text-align: right;">[Page 46]</p>	<p>1 Q. Were you consulted with respect to 2 the decision to terminate Mr. Mansour? 3 A. No. 4 Q. Were you made aware of the 5 allegation that he was stealing? 6 A. Clarify please. 7 Q. I withdraw the question. 8 MR. VALLAS: I'd like to ask the 9 court reporter to mark this document 10 Chrinian 3. 11 (Whereupon, Exhibit No. Chrinian 3, 12 Answers to Interrogatories, was marked for 13 identification.) 14 BY MR. VALLAS: 15 Q. Mr. Chrinian, I do have questions 16 about specific pages of this document; but 17 before I ask you to review it, I just want to 18 ask whether you recognize it? 19 A. No. 20 Q. Are you aware that Factory Direct 21 was served with Interrogatories in this matter? 22 A. No. 23 Q. Do you know what Interrogatories 24 are? 25 A. No.</p> <p style="text-align: right;">[Page 48]</p>
<p>1 Q. Did you direct any Factory Direct 2 employee to contact Mr. Mansour with respect to 3 Ms. Hoang's allegation? 4 A. I was not involved in the 5 investigation; or it was the HR manager, as I 6 said earlier, who is responsible to follow up 7 on any employee inquiry of any kind. 8 Q. So the answer then is no? 9 A. No. 10 Q. <u>Why did Mr. Mansour's employment</u> 11 <u>with Factory Direct cease?</u> 12 A. <u>It ceased -- he was terminated for</u> 13 <u>stealing.</u> 14 Q. <u>Mr. Mansour was terminated?</u> 15 A. <u>For stealing.</u> 16 Q. Do you know who -- strike that. 17 Who made the decision to terminate 18 Mr. Mansour? 19 A. His supervisor. 20 Q. Who was his supervisor at the time? 21 A. It would have been Jerry Cook in 22 HR. 23 Q. And the HR director at the time was 24 Hazel Bautista, correct? 25 A. Yes.</p> <p style="text-align: right;">[Page 47]</p>	<p>1 Q. I'd like to direct your attention 2 to page 7 of this document, and specifically 3 the second paragraph from the top beginning 4 with Mr. Cook. The paragraph reads, "Mr. Cook 5 planned to discharge Mansour January 17, 2012, 6 meeting. But after being confronted with 7 evidence of his theft and contradicted by Maj 8 and Ms. Arias, Mansour became frustrated and 9 stated that he was resigning from employment. 10 Mr. Cook accepted Mansour's resignation and 11 Mansour walked out." 12 Were you involved in the 13 preparation of that answer at all? 14 A. No. 15 Q. <u>Did Mr. Cook inform you that</u> 16 <u>Mr. Mansour had resigned?</u> 17 A. <u>No. Subsequently, I was notified</u> 18 <u>that he was caught stealing. He was caught on</u> 19 <u>tape and that they sat down with him with the</u> 20 <u>proof and he denied it. So they fired him.</u> 21 Q. <u>Mr. Cook told you that they had</u> 22 <u>fired him?</u> 23 A. <u>(Witness nodding.)</u> 24 Q. When you say -- 25 A. That's what you do when you catch</p> <p style="text-align: right;">[Page 49]</p>

[13] (Pages 46 to 49)